

EPA Incorporation of Dr. Karl Gustavson's (EPA) Technical Comments submitted February 9, 2018
Pre-RD Fish Tissue Field Sampling Plan (FSP) dated January 18, 2018
Portland Harbor Superfund Site

Comment	How incorporated in EPA comments
1. Section 2.3. Do we want to get into this? The "segments" were their deal, not ours. Their intent is to get 95 fish where their locations are positioned. Is this comment asking them to relocate those?	EPA has addressed this comment by revising Primary Comment 3 to state that the description of the sampling locations in Section 2.3 must be consistent between the FSP, PDI Work Plan, and QAPP.
2. Section 4.3.1. In response to the EPA comment: "This section, Angling, describes the use of lead weighted hooks for fishing the bottom. The revised FSP must note that disturbance of sediment during angling will be kept to a minimum to avoid resuspending contaminated sediments." They used same text from GSI that EPA approved. This comment is not helpful or necessary.	EPA has addressed this comment by removing the Primary Comment quoted to the left consistent with Dr. Gustavson's edits.
3. Appendix A. The sentence at the bottom of page 1 "A position will be recorded electronically at each location where plant tissues and soil are collected." Should be read "A position will be recorded electronically at each location that smallmouth bass are collected." It should also be clarified in the main text that the capture location of each smallmouth bass will be recorded.	EPA has incorporated this comment into Primary Comment 10.
4. Section 2.5. Removing up to 10 (out of 40 total) tagged fish for fish tissue sampling for 7 months of the 12-month fish tracking study would significantly reduce the tagged fish population and is considered a last resort. Preferably, tagged fish will be returned to the river, noting in field notes which tagged fish were caught. Instead of sacrificing tagged fish, areas of the site not that are not currently slated to be fished should be fished to obtain sufficient fish numbers. That contingency maintains the DQOs of the fish sampling and tracking efforts. If tagged fish will be sampled then the FSP should include a protocol for the acoustic tracking team to immediately capture additional fish and re-implant tags.	EPA has incorporated these changes in TBC comment 1.
5. Section 4.2, page 6. The current text describes positioning of the sampling vessel to within 1 to 2 meters. The section on positioning and the FSP in general should permit professional judgement to be used to determine exact fishing locations. For example, it should not be misconstrued that anglers have to anchor and fish within 1-2 m of a precise	EPA has included this comment as TBC comment 3.

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<p>location while not fishing a productive area 20 meters away. Such flexibility is likely intended by the FSP, but perhaps those expectations should be clarified. Emphasis should be place on capturing the proposed number of fish from locations distributed throughout the site and in the DR/UR, less on the number of meters from the proposed location. In this regard, the fishers should have flexibility to fish the area, but be required to document the coordinates of fish capture</p>	
<p>6. Section 4.3.3, page 7: The integrity of the study design is premised on collecting sufficient sample numbers in areas spread throughout the site, so contingencies should be in place that prioritize that goal. Contingencies should be added to fish additional areas if re-visiting stations is not productive. Please add a contingency that if revisiting the pre-selected stations is not successful, then fishers should sample throughout river mile sides that are under-represented in terms of the numbers of fish caught at that point in the collection effort.</p>	<p>EPA has included this comment as Primary Comment 14.</p>